

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CENTER FOR WORKPLACE COMPLIANCE
(f/k/a EQUAL EMPLOYMENT ADVISORY
COUNCIL),

Plaintiff,

v.

LITTLER MENDELSON, P.C., LANCE E. GIBBONS,
THERESA GOKTURK (a/k/a CHRIS GOKTURK), and
DOE DEFENDANTS 1-10, INCLUSIVE,

Defendants.

Case No. 1:20-cv-01387-AJT-JFA

**CENTER FOR WORKPLACE COMPLIANCE’S OBJECTIONS TO LITTLER
MENDELSON, P.C.’S FIRST SET OF REQUESTS FOR ADMISSION**

Pursuant to Fed. R. Civ. P. 36 and Local Civil Rule 26, Defendant Center for Workplace Compliance (“CWC,” “Association,” or “Plaintiff”) hereby submits its objections First Set of Requests for Admission (the “Requests”) served on it by Defendant Littler Mendelson, P.C. (“Littler” or “Defendant”) as follows:

PRELIMINARY STATEMENT

1. Plaintiff’s objections are made pursuant to Local Rule 26(C) and Plaintiff shall serve its responses within 30 days of service or a date otherwise agreed to by the Parties.
2. Plaintiff denies all Requests or parts thereof that are not expressly admitted.
3. Plaintiff’s responses are made solely for purposes of this action, and not for purposes of any other action. These responses are subject to all objections as to competence, relevance, materiality, propriety, admissibility, and any and all other objections or grounds that would require the exclusion of evidence disclosed herein if the evidence were produced and

sought to be introduced into evidence in Court; all of which objections and grounds are specifically reserved and may be interposed at the time of trial or other attempt to use one or more of these responses.

4. Plaintiff's responses are made without in any way waiving or intending to waive, but on the contrary, preserving and intending to preserve, the following:

- a. All questions of authenticity, relevance, materiality, privilege, and admissibility as evidence for any purpose of the information provided, which may arise in any subsequent proceeding in, or the trial of, this or any other action;
- b. The right to object to the use of said information at any subsequent proceeding in, or the trial of, this or any other action, or any other grounds;
- c. The right to object on any ground at any time to other Requests or other disclosures involving said information or subject matter thereof; and
- d. The right to make additions and/or amendments to these responses if further disclosure or investigation yields information called for in disclosure.

SPECIFIC OBJECTIONS TO DEFINITIONS

The following objections apply to each and every separately-numbered Request and are incorporated by reference into each and every specific response as if set forth in full in each separately-numbered response. Plaintiff's responses, regardless of whether they include a specific objection, do not constitute an adoption or acceptance of the definitions and instructions that Plaintiff seeks to impose.

1. Plaintiff objects to Littler's definitions of "You" and "CWC" as overbroad and unduly burdensome. Plaintiff will interpret "You" and "CWC" to mean Center for Workplace

Compliance and its predecessors, including, without limitation, Equal Employment Advisory Council.

REQUEST NO. 1:

Admit that defendant Lance Gibbons was never employed by CWC.

OBJECTION TO REQUEST NO. 1:

Pursuant to Local Rule 26(C), Plaintiff serves only its objections at this time. Plaintiff will respond to this Request within 30 days from the date of service.

REQUEST NO. 2:

Admit that defendant Theresa Gokturk was never employed by CWC.

OBJECTION TO REQUEST NO. 2:

Pursuant to Local Rule 26(C), Plaintiff serves only its objections at this time. Plaintiff will respond to this Request within 30 days from the date of service.

REQUEST NO. 3:

Admit that of all the copyright registrations identified in Exhibit B to your Amended Complaint, CWC could potentially elect statutory damages only for proven infringement of the registrations identified as “Claim Numbers” 1-11.

OBJECTION TO REQUEST NO. 3:

Pursuant to Local Rule 26(C), Plaintiff serves only its objections at this time. Plaintiff objects to this Request on the basis that it is compound. Plaintiff will respond to this Request within 30 days from the date of service.

Dated: February 5, 2021

Respectfully submitted,

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Mark L. Krotoski

/s/ J. Kevin Fee

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*Attorneys for Center for Workplace
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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2021, the foregoing Center for Workplace Compliance's Objections to Littler Mendelson, P.C.'s First Set of Interrogatories was served via email with consent upon the following:

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/s/ J. Kevin Fee
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